

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION
Case No. 1:23-cv-00284-MR-WCM

RYAN CRAIG STEVENS,

Plaintiff,

v.

MONTREAT COLLEGE, DR.
PAUL J. MAURER, DR. DANIEL
BENNETT, DR. DOROTHEA
SHUMAN, and DR. RYAN ZWART,

Defendants.

**DEFENDANTS' MOTION FOR
GATEKEEPER ORDER AND
OTHER SANCTIONS**

Defendants Montreat College, Dr. Paul J. Maurer , Dr. Daniel Bennett, Dr. Dorothea Shuman, and Dr. Ryan Zwart (collectively, “Defendants”), pursuant to Federal Rule of Civil Procedure 11 and the Court’s inherent authority to prevent frivolous and vexatious filings, hereby respectfully move the Court to impose sanctions upon Plaintiff Ryan Craig Stevens (“Plaintiff”) in the form of monetary sanctions and the imposition of a pre-filing injunction. The facts and arguments in support of this Motion are set forth in Defendant’s Brief in Support of this Motion for Gatekeeper Order and Other Sanctions filed contemporaneously herewith.

Respectfully submitted, this the 5th day of March, 2025.

WOMBLE BOND DICKINSON (US) LLP

By: /s/ Jesse A. Schaefer
Beth Tyner Jones, N.C. State Bar No. 15923
Jesse Schaefer, N.C. State Bar No. 44773
Zachary S. Buckheit, N.C. State Bar No. 55123
555 Fayetteville Street, Suite 1100
Raleigh, NC 27601
Telephone: (919) 755-8182
Facsimile: (919) 755-6752
Email: jesse.schaefer@wbd-us.com
beth.jones@wbd-us.com
zach.buckheit@wbd-us.com

*Counsel for Defendant Montreat, Dr. Paul J.
Maurer, Dr. Daniel Bennett, Dr. Dorothea Shuman,
and Dr. Ryan Zwart*

CERTIFICATE OF SERVICE

I hereby certify that I have this day filed the foregoing in the CM/ECF system and served the foregoing to the following persons via U.S. mail and email:

Ryan Stevens
23 Sleepy Hollow Lane
Swannanoa, NC 28778
Email: ryan_stevens316@icloud.com
Pro se Plaintiff

This the 5th day of March, 2025.

WOMBLE BOND DICKINSON (US) LLP

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Beth Tyner Jones, N.C. State Bar No. 15923
Jesse Schaefer, N.C. State Bar No. 44773
Zachary S. Buckheit, N.C. State Bar No. 55123
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Raleigh, NC 27601
Telephone: (919) 755-8182
Facsimile: (919) 755-6752
Email: jesse.schaefer@wbd-us.com
beth.jones@wbd-us.com
zach.buckheit@wbd-us.com

Counsel for Defendant Montreat, Dr. Paul J. Maurer, Dr. Daniel Bennett, Dr. Dorothea Shuman, and Dr. Ryan Zwart